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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**FCC MAIL ROOM**

In the Matter of	)	
	)	
Establishment of Public Service Radio	)	RM-9405
Pool in the Private Land Mobile	)	
Frequencies Below 800 MHz	)	

**COMMENTS OF PUBLIC SERVICE ELECTRIC AND GAS COMPANY**

Pursuant to Section 1.405 of the FCC's Rules, Public Service Electric and Gas Company (PSE&G) hereby submits Comments in support of the above captioned "Petition for Rulemaking" filed August 14, 1998, by UTC, The Telecommunications Association (UTC), the American Petroleum Institute (API), and the Association of American Railroads (AAR).

Introduction

PSE&G is New Jersey's largest electric and gas utility. As an energy utility regulated by the state, we are obligated to provide safe and effective gas and electric service to nearly two million customers. PSE&G, like most domestic energy utilities, utilizes private wireline and wireless telecommunications systems to support its operations.

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## Comments

Private telecommunications systems are critically important to PSE&G for two reasons. First, utility operations involve the provision of vital services to all segments of the community and, when interrupted, must be restored quickly. In most cases, damage to PSE&G utility plant also affects public switched and common carrier based services. Thus, we rely on private telecommunications systems to ensure that communications between and among our work forces remains intact even during emergencies that may affect public or common carrier systems.

Second, only the utility is qualified to interrupt gas and electric service to structures or to areas that must be made safe prior to the engagement of state, county and municipal public safety services. Fire suppression, search and rescue operations, and evacuation ordinarily cannot commence until electric and/or gas service is disconnected.

To safely operate electric switches and gas valves, PSE&G personnel must be able to communicate immediately, directly, clearly, and reliably with each other and with their dispatchers. Any interference with such communication puts our personnel, public safety agencies and the public at substantial risk. Miscommunication at this level can and does result in serious injury, property damage, or even death. Therefore, our command, control and dispatching systems require continuous availability. Disruption or interference can and does impact the

health, safety and welfare of the public, our own personnel, and public safety personnel.

As a direct result of the new competitive frequency coordination process, PSE&G gas operations began to experience radio interference within our Summit (NJ) Gas District in February 1998. The interfering signal was so strong that it dominated the district's service area. Dispatchers could not hear mobiles and mobiles could not hear dispatchers. Channel utilization from the interfering station was more than 85%.

PSE&G initiated a formal complaint to the FCC on or about February 9, 1998. While that complaint was pending, the same frequency coordinator approved additional applications for the same frequency -- all within five miles of one other and within five miles of the original interfering source. Between February 9 and June 19, when the FCC rescinded the interfering applicant's conditional authority and rejected their application, PSE&G documented sixteen (16) instances in which emergency response was delayed to gas leaks and to service disconnects requested by local fire, police and emergency management agencies.

PSE&G's Summit Gas District was only the first to experience radio interference as a result of the competitive coordination process. Since May 1998, PSE&G gas dispatch operations in the Newark/Jersey City (NJ) District, Trenton (NJ) District, and Burlington (NJ) District are similarly affected.

Unless the FCC effects a change, competitive frequency coordination will continue to result in the approval of channels already assigned and in close proximity to critical utility operations. It is no longer a question of 'if' loss of life will occur, but 'when'.

The rules change requested in the instant proceeding is a reasonable approach to addressing the problem and in protecting the safety of our personnel, the public, and public safety agencies.

#### Conclusion

In conclusion, PSE&G supports the instant Petition for Rulemaking and urges the FCC to issue promptly a Notice of Proposed Rulemaking to create the 'Public Service Radio Service' described within the Petition.

Respectfully submitted,

PUBLIC SERVICE ELECTRIC AND GAS  
COMPANY

By:

  
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Dated: December 21, 1998

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of Public Service Electric and Gas Company" was sent by first-class mail, postage prepaid, to the following persons this 21 day of December, 1998.

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